

FILED  
Clerk  
District Court

DEC - 9 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Robert D. Bradshaw  
PO Box 473  
1530 W. Trout Creek Road  
Calder, Idaho 83808  
Phone 208-245-1691

Plaintiff, Pro Se

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW

) Case No. CV 05-0027

Plaintiff

v.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS (hereafter referred to  
as the CNMI); et. al.

Defendants

) **AFFIDAVIT IN SUPPORT OF**  
) **MOTION TO SERVE ROBERT A.**  
) **BISOM BY PUBLICATION**  
) **AND FOR A CHANGE TO THE**  
) **PERIOD ALLOWED FOR**  
) **SERVICE FROM 120 DAYS TO**  
) **240 DAYS**

1. In the US District Court (USDC) civil case 05-0027, Plaintiff served summons and process on defendant ROBERT A. BISOM by certified mail, return receipt, per the CNMI CMC on Mr BISOM's attorney Jay H. Sorensen. Mr Sorensen or his agent accepted this service. Attached at Exhibit One is the front of the envelope mailed to Mr BISOM. Exhibit Two is a copy of the certified mail receipt of the mailing, now on file in the CNMI USDC.

2. Exhibit Three is a copy of a letter which BRADSHAW received from Mr Sorensen in Sep 2005 from Mr Sorensen as Mr BISOM's attorney as doing business as Mr BISOM's lawyer at a attorney address in Warren, Michigan. As late as Oct 11, 2005, Mr Sorensen reportedly represented Mr BISOM in the CNMI Superior Court case 96-1320.

3. In USDC civil case 05-0084, Cynthia Sorensen, the alleged agent of Mr Sorensen, accepted personal service on both Messers Sorensen and BISOM at a residence in Somis, California which she shared as a co-occupant with Mr Sorensen. She forwarded the served process to Mr Sorensen who in turn apparently contacted both Mr BISOM and a local law firm (Ramsden and Lyons) in Coeur d'Alene, Idaho to represent Messers Sorensen and BISOM.

4. On Nov 14, 2005 (Saipan time), BRADSHAW filed a motion by fax for the Clerk of Court to enter a default judgment on Mr BISOM as there was no answer on the complaint served him on Oct 11, 2005. The answer was due Oct 31, 2005. Though Mr Sorensen ignored the service on Mr BISOM, he filed a motion dated Oct 26, 2005 for an extension of time to file his own answer to 05-0027.

5. In accordance with usual court procedures, BRADSHAW supplied Mr Sorensen with copies of the motion for default on Mr BISOM as filed by BRADSHAW. Now, on Nov 17, 2005, BRADSHAW received the enclosed letter and envelope (Exhibit Four) from Mr Sorensen claiming that he does not represent MR BISOM "in this matter" and that he is not authorized to accept service of summons and complaint on his behalf.

6. But in Mr Sorensen's letter, he acknowledged that he received the packet of process served Mr BISOM, c/o Mr Sorensen, on October 11, 2005 or at least when he received the process served on himself a few days later. Since the material sent Mr BISOM was received by Mr Sorensen, it is unclear what Mr Sorensen did with it after accepting it in mid Oct 2005. As the attorney for Mr BISOM, surely Mr Sorensen must have opened the envelope (but he seems to deny now that he opened it). For sure, he did not return it to BRADSHAW and he made no effort to notify BRADSHAW at that time. Curiously, the

eventual mailing from Mr Sorensen to BRADSHAW was made on Nov 14, 2005 (or Nov 15, 2005 Saipan and China time) from Royal Oak, Michigan; one day after BRADSHAW filed his motion for default in the CNMI USDC. While this letter appears to be dated Nov 9, 2005, it could have been prepared anytime by Nov 14, 2005 (US time), when it was mailed.

7. In previous communications with Mr Sorensen, he has never notified BRADSHAW of any limitations he faced in representing Mr BISOM; nor has Mr Sorensen noticed the CNMI Superior Court of any such limitations. In Aug 2005, BRADSHAW notified both Messers Sorensen and BISOM through their ID attorney that the Idaho case was being refiled with the USDC on Saipan. They both knew that summons and complaints were coming from BRADSHAW to themselves. Mr Sorensen clearly knew as he admits that he saw that the package to Mr BISOM was of the same type as the one to himself.

8. Because Mr Sorensen now claims to lack authority to accept process for Mr BISOM, this motion is being filed to request that the court change the response time from 120 days to 240 days and allow BRADSHAW to serve Mr BISOM by publication.

9. Mr Sorensen has been in obvious contact with and provided legal assistance to Mr BISOM from at least 1995 to date. Once the legal notice of the summons and complaint is made on Mr BISOM in the Saipan papers, it is anticipated that Mr Sorensen will so advise Mr BISOM that he has been legally served. Mr Sorensen will know as BRADSHAW will file all proceedings with Mr Sorensen as a part of the court procedures in this case.

Dated at St. Maries, Idaho, this 21st day of November 2005.

Robert D. Bradshaw

Robert D. Bradshaw, Plaintiff Pro Se

STATE OF IDAHO

COUNTY OF BENEWAH

I, Jerry Lee Nelson, Notary in and for the State of Idaho,

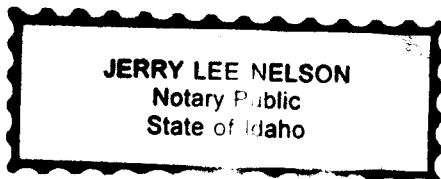
residing at St. Maries, Idaho do hereby certify that on this

21 day of November 2005, personally appeared

before me Robert D. Bradshaw, to me known to be the individual described in and who executed the within instrument for the uses and purposes herein mentioned.

Given Under My hand and Official Seal; this 21 day of November 2005.

  
NOTARY PUBLIC IN AND FOR THE STATE OF IDAHO



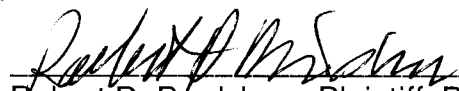
MY APPOINTMENT EXPIRES

11/15/07

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10<sup>th</sup> day of Dec 2005, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022  
The Attorney General, 2d Floor of the Juan A. Sablan Memorial Bldg,  
Caller Box 10007, Capitol Hill, Saipan, MP 96950.

  
Robert D. Bradshaw, Plaintiff, Pro Se

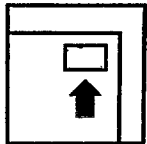
**FLAT RATE**1/14/11  
ONE  
Recycled Paper**PRIORITY  
MAIL**

UNITED STATES POSTAL SERVICE

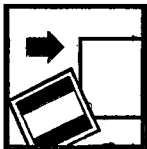
www.usps.com

**HOW TO USE:****1. COMPLETE ADDRESS LABEL AREA**

Type or print required return address and addressee information in customer block (white area) or on label (if provided).

**2. PAYMENT METHOD**

Affix postage or meter strip to area indicated in upper right hand corner.

**3. ATTACH LABEL (If provided)**

Remove label backing and adhere over customer address block area (white area).

*From:*

Robert Bradshaw  
PO Box 473  
Calder, ID 83808-0473

*To: ROBERTA. BISON CARE OF  
JAY H. SORENSON, ATTORNEY  
FOR ROBERT A. BISON  
C/O SHANGHAI  
PO Box 9022  
WARREN, MI 48090*

**▲ PLACE LABEL HERE ▲****The efficient FLAT RATE ENVELOPE.**

**You don't have to weigh the envelope...Just pack all your correspondence and documents inside and pay only the FLAT RATE Priority Mail postage.**

**We Deliver.**

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		A. Signature X <i>Dennis Bennett</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: ROBERT A. BISON, c/o JAY H. SORENSEN ATTORNEY FOR ROBERT A. BISON c/o SHANGHAI PO BOX 9022 WARREN, MI 48090		B. Received by (Printed Name) DENNIS BENNETT	
2. Article Number (Transfer from service label) 7099 3220 0001 3672 1738		C. Date of Delivery OCT 11 2005	
PS Form 3811, August 2001		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No MAIN PO WARREN, MI 48090	
Domestic Return Receipt		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
102595-02-M-1035		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To: ROBERT A. BISON, c/o JAY SORENSEN Box 9022, WARREN, MI 48090	
Postage	\$ 3.85
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 7.90
Name (Please Print Clearly) (To be completed by mailer) ROBERT BRADSHAW	
Street, Apt. No., or PO Box No. Box 473	
City, State, ZIP+4 CALDER, ID 83808	
PS Form 3800, July 1999 See Reverse for Instructions.	

EXHIBIT  
TWO

COPY

**JAY H. SORENSEN**  
**Attorney at Law**  
**c/o Shanghai**  
**P.O. Box 9022**  
**Warren, MI 48090-9022**  
**Phone (Shanghai,China): 86-21-5083-8542**

Attorney for Plaintiff and Judgment Creditor

**IN THE SUPERIOR COURT  
 OF THE  
 COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

ROBERT A. BISOM	)	CIVIL ACTION NO. 96-1320
	)	
Plaintiff,	)	
	)	<b>INTERROGATORIES</b>
v.	)	<b>TO DEFENDANT .</b>
	)	<b>ROBERT D. BRADSHAW</b>
COMMONWEALTH OF THE NORTHERN	)	
MARIANA ISLANDS, ROBERT D.	)	
BRADSHAW, former Temporary Public	)	
Auditor, in his individual capacity, et al.	)	
	)	
Defendants.	)	
	)	

To: ROBERT D. BRADSHAW, P.O. Box 473, 1530 W. Trout Creek Road, Calder, Idaho 83808

Plaintiff, ROBERT A. BISOM, serves these interrogatories on ROBERT D. BRADSHAW, as authorized by Rule 33, Commonwealth Rules of Civil Procedure. ROBERT D. BRADSHAW must serve his answer to each interrogatory separately and fully, in writing and under oath, within 30 days after service.

DEFINITIONS

The following terms have the following meanings, unless the context requires otherwise:

A. Parties. The term "plaintiff" or "defendant," as well as a party's full or abbreviated name or a pronoun referring to a party, means the party and, where applicable, {his/her/its} agents, representatives, officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

B. Person. The term "person" is defined as any natural person, any business, a legal or governmental entity, or an association.

EXHIBIT  
THREE



C. Document. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a) and includes computer records in any format. A draft or nonidentical copy is a separate document within the meaning of this term. The term "document" also includes "any tangible things" as that term is used in Rule 34(a).

D. Communication. The term "communication" means the transmittal of information in the form of facts, ideas, inquiries, or otherwise.

E. Identify (person). When referring to a person, "identify" means to give, to the extent known, the person's full name, present or last known address, telephone number, and, when referring to a natural person, the present or last known place of employment. Once a person has been identified in compliance with this paragraph, only the name of that person need be listed in response to later discovery requesting the identification of that person.

F. Identify (document). When referring to documents, "identify" means to give, to the extent known, the following information: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the authors, addressees, and recipients of the document; (e) the location of the document; (f) the identity of the person who has custody of the document; and (g) whether the document has been destroyed, and if so, (i) the date of its destruction, (ii) the reason for its destruction, and (iii) the identity of the person who destroyed it.

G. Relating. The term "relating" means concerning, referring, describing, evidencing, or constituting, directly or indirectly.

H. All/Each. The terms "all" and "each" should be construed as "and," "each," and "and/or."

I. Any. The term "any" should be understood in either its most or its least inclusive sense as necessary to bring within scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

J. And/Or. The connectives "and" and "or" should be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

K. Number. The use of the singular form of any word includes the plural and vice versa.



INTERROGATORIES

1. As to any real property in which you have any ownership interest, please:
  - 1.1 State its description, in terms of location, size and improvements;
  - 1.2 Identify any liens against it, including the type of lien, the name and address of the lien holder and the balance of any debt secured by the lien.
  - 1.3 Describe the nature of your interest.
2. As to any accounts you have at any financial institution, please state:
  - 2.1 The name and address of the financial institution and your account number;
  - 2.2 The balance in the account at this time;
  - 2.3 The balance in the account on March 1, 2004.
3. As to any item of personal property that you own with a market value in excess of US\$500.00, please:
  - 3.1 Describe the item:
  - 3.2 Identify the place where you keep the item;
  - 3.3 State the value of the item, as best you can estimate;
4. As to all money you have in cash at this time, please state:
  - 4.1 How much, and if in currency other than United States, identify what currency;
  - 4.2 Where it is held.
5. As to any transfers of any assets or property with a value of over US\$500.00 from you since May, 2000, please:
  - 5.1 Identify the asset or property;
  - 5.2 Identify the person to whom the asset or property was transferred;
  - 5.3 The date of the transfer;
  - 5.4 Explain why you made the transfer.

6. As to any debts or liabilities you have now, please:

6.1 Identify the nature of the debt or liability as to why it is owed and the amount'

6.2 Identify the person or other entity to whom it is owed.

7. Please state your net worth at this time, including an explanation of how you calculated or estimated it.

8. As to any employment or business you have, or have had during the past three years, please:

8.1 Discribe the nature of that employment or business;

8.2. Identify the employer or business as to name, address and telephone number;

8.3 State the amount of income you have derived from that employment or business for the last three years.


9. As to any other source of income not previously described in answer to interrogatories above, which you have at the present time, please:

9.1 Identify the source of that income;

9.2 Describe what income you receive from that source, including the amount and frequency you receive it;

9.3 State the reason that you receive that income.


10. Please describe any travel you have done outside the United States during the last five years, including the destination(s), inclusive dates of the visit(s), and reason for the travel.

  
Jay H. Sorensen  
Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on SEPTEMBER 12, 2005  
a copy of the within INTERROGATORIES TO DEFENDANT ROBERT D. BRADSHAW  
was deposited for delivery to the U.S. Post Office, first class mail, postage prepaid,  
addressed as set forth below:

Robert D. Bradshaw  
P.O. Box 473  
1530 W. Trout Creek Road  
Calder, Idaho 83808

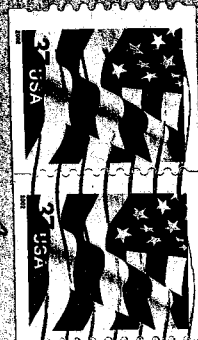
  
Jay H. Sorensen

Jay H. Sorensen  
c/o Shanghai  
P.O. Box 9022  
Warren, MI 48090-9022

Robert D. Broadman  
P.O. Box 473  
1530 W. Trout Creek Rd  
Chick, Idaho 83808

Postage & Fees Paid

Received  
SEP 17 2005  
5:12:11 PM



**JAY H. SORENSEN**  
c/o Shanghai  
P.O. Box 9022  
Warren, MI 48090-9022  
Tel. No. 86-21-5083-8542

November 9, 2005

Robert D. Bradshaw  
P. O. Box 473  
1530 W. Trout Creek Road  
Calder, Idaho 83808


Re: Bradshaw v. C.N.M.I. et al. (Dist. Ct. NMI Case No. CV 05-0027)

Dear Mr. Bradshaw:

Enclosed is a copy of the Order Granting Extension of October 28, 2005.

I note that you sent me a package that is addressed to Robert A. Bisom in care of me, which, judging from the similarity to the one addressed to me, is also summons and complaint. However, you should know that I do not represent Mr. Bisom in this matter; and, even if I did, I do not have authorization from him to accept service of summons and complaint on his behalf. You will have to otherwise serve him.

Very truly yours,

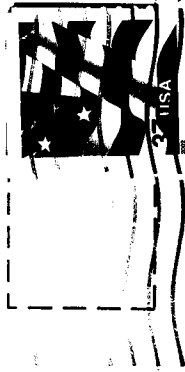
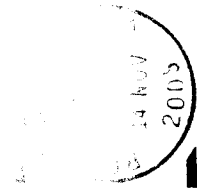


Jay H. Sorensen

encl.

EXHIBIT  
FOUR

Jay H. Sorensen  
c/o Shanghai  
P.O. Box 9022  
Warren, MI 48090-9022



ROBERT D. BRADSTADT  
P.O. Box 473  
CALDER, IDAHO 83808

Received  
Nov 17  
11:10 PM

邮政编码

